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FEDERAL COMMUNICATIONS COMMISS
OFFICE OF THE SECRETARY

January 22, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, D.C. 20554

**NOTICE OF EX PARTE
PRESENTATION**
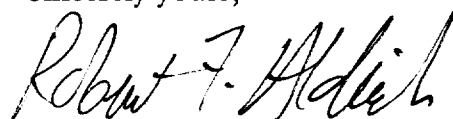
Re: **WT Docket No. 96-198**

Dear Ms. Salas:

On January 21, 1999, Robert Aldrich of this law firm, representing the Multi-Media Telecommunications Association ("MMTA") and Robert Chrostowski, Senior Vice President of Iwatsu and Chairman of MMTA's Government Relations Committee met with Elizabeth Lyle, Senior Advisor to the Wireless Bureau Chief, and the following members of the Disabilities Task Force – Susan Kimmel, Jon Spencer, Frank Stilwell and Thomas Wyatt.

We discussed MMTA's concept of a system-based approach to Section 255 compliance for business telecommunications equipment. The points discussed are summarized in the attached document, an earlier draft of which was provided at the meeting. The attached version reflects wording changes that better capture the substance of the discussion of the meeting.

If you desire any further information, please contact the undersigned.

Sincerely yours,

Robert F. Aldrich

RFA/nw
cc: Elizabeth Lyle
        Susan Kimmel
        Jon Spencer
        Frank Stilwell

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SYSTEMS-BASED ACCESSIBILITY: AN APPROACH

TO BUSINESS TELECOMMUNICATIONS EQUIPMENT

COMPLIANCE WITH SECTION 255

EX PARTE PRESENTATION

MULTI-MEDIA TELECOMMUNICATIONS ASSOCIATION

JANUARY 22, 1999

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I.   TIA's Product Line Approach for Consumer Equipment

- ◆ Product line = "that subset of a manufacturer's products which provides the consumer with [1] a like primary telecommunications function, over [2] a like telecommunications transmission standard or media." TIA submission at 3.

- ◆ Under product line approach, the focus is on providing accessible features for each product line grouping, without necessarily combining all accessibility features in every single product or version

- ◆ "Manufacturers should attempt to provide a product that is accessible to persons with particular functional limitation(s) which have features, functions, and a price that are comparable to the model(s) within the product line that are not accessible to that particular functional limitation(s)." TIA submission at 11.

II. Business Telecommunications Systems

- ◆ Focus is on marketing systems, not individual components

- ◆ System components may be supplied by system manufacturer or other manufacturers

- ◆ System functions are accessed through each user's terminal (e.g., telephone set, PC)

- ◆ System components are modular, can be customized with software and hardware variations

- ◆ System purchase decisions are made by the business entity, not individual users

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III. Applying a System-Based Approach to Section 255 Compliance in the Business Context

- ◆ "System is the solution"

  - Customized software

  - Accessibility can be provided on most appropriate terminal device

  - Takes advantage of computer telephony connectivity advances – e.g., TAPI

- ◆ Various possible configurations of a given type of system can provide accessibility

  - Part 68 system registration numbers may be one way to define "product lines"

- ◆ Advantages for Manufacturer:

  - Flexibility

  - Design cost savings

  - Encourages innovation and initiative

- ◆ Advantages for User:

  - Encourages positive approach by manufacturers

  - More accessibility features become "readily achievable"

  - Allows business to focus purchasing decisions on the accessibility functions needed by employees

  - Modularity provides capabilities to meet expanded accessibility needs or take advantage of new technology

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